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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND/SAN FRANCISCO DIVISION**

META PLATFORMS, INC., a Delaware  
corporation;

Plaintiff,

v.

Social Data Trading Ltd., d/b/a “SOCIAL  
DATA,” “SOCIALDATA.HK,” and  
“IQDATA.SOCIAL”

Defendant.

Case No. 21-cv-09807 AGT

**DECLARATION OF LEAR JIANG IN  
SUPPORT OF PLAINTIFF’S MOTION  
TO CONTINUE THE INITIAL CASE  
MANAGEMENT CONFERENCE [L.R.  
6-1(B)]**

Current Date: March 25, 2022  
Proposed Date: July 15, 2022  
Time: 2:00pm  
Courtroom: A—15th Floor  
Judge: Hon. Alex G. Tse

DECLARATION OF L. JIANG ISO MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

[L.R. 6-1(B)]

Case No. 21-cv-09807 AGT

1 I, Lear Jiang, hereby declare and state as follows:

2 1. I am an associate at the law firm of Susman Godfrey L.L.P., counsel of record for  
3 Plaintiff Meta Platforms, Inc. ("Plaintiff"). I have personal knowledge of the matters set forth in  
4 this declaration, and if called upon as a witness I could and would testify competently thereto.

5 2. I make this declaration in support of Plaintiff's Motion to Continue the Initial Case  
6 Management Conference [L.R. 6-1(B)].

7 3. Upon filing of this action, I coordinated with and retained the services of Crowe  
8 Foreign Services ("Crowe") to assist with service of process of the Defendant via the Hague  
9 Convention on the Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial  
10 Matters ("Hague Convention").

11 4. Crowe has informed me that the Hong Kong Central Authority received the relevant  
12 documents for service of process on January 21, 2022.

13 5. Crowe has informed me that Hague Convention service in Hong Kong could take  
14 approximately another four additional months from delivery of the relevant documents to the Hong  
15 Kong Central Authority until the Defendant is properly served.

16 6. Plaintiff is unable to meet and confer with Defendant to limit any potential  
17 disagreements and bring them to the Court's attention prior to the Initial Case Management  
18 Conference. Absent the continuance requested by the Plaintiff, Plaintiff and the Court will waste  
19 resources that are best reserved until Defendant appears in this Action.

20 7. This is the first request for any continuance in this case. A grant of Plaintiff's request  
21 for continuance will have minimal impact on the schedule for this case because Defendant has not  
22 appeared and a scheduling order has not been entered in this case.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing  
24 is true and correct.

25 Executed this 4th day of March 2022, at Los Angeles, California.

26 /s/ Lear Jiang  
27 Lear Jiang